

**VERMONT SECRETARY OF STATE****Corporations Division**

MAILING ADDRESS: Vermont Secretary of State, 128 State Street, Montpelier, VT 05633-1104

DELIVERY ADDRESS: Vermont Secretary of State, 128 State Street, Montpelier, VT 05633-1104

PHONE: 802-828-2386

WEBSITE: www.sec.state.vt.us**1. Acknowledgement Information.**

- a. **Name:** Joel Buhr
- b. **Acknowledgement Address:** 1508 J F Kennedy Dr, Suite 103, Bellevue, NE, 68005, USA
- c. **Email Address:** joel@firstdirectmarketing.com
- d. **Phone No:** (402) 403-0000

2. Data Broker Information.

- a. **Name:** First Direct, Inc. and its subsidiaries/affiliates
- b. **Primary Physical Address:** 1508 J F Kennedy Dr, Suite 103, Bellevue, NE, 68005, USA
- c. **Primary Email Address:** sales@firstdirectmarketing.com
- d. **Primary Internet Address (URL):** www.firstdirectmarketing.com

3. Does the data broker permit a consumer to opt out of the data broker's collection of brokered personal information, opt out of its databases or opt out of certain sales of data? ☒ Yes ☐ No*If so:***a. What was the method for requesting an opt-out?**

First Direct, Inc. receives opt-out requests via various methods (letter, email, phone). These requests primarily come from our customers on behalf of end consumers. First Direct, Inc. promptly removes these consumers from current and all future file deliveries where possible and passes this on to other affected partners.

b. If the opt-out applied to only certain activities or sales, which ones?

Applies to any activity

c. Does the data broker permit a consumer to authorize a third party to perform the opt-out on the consumer's behalf?

All requests must come directly from the consumer affected.

4. Statement specifying the data collection, databases or sales activities from which a consumer may not have opted out during the prior year:

N/A Consumers have the ability to opt out of our database and or partner data and future use of their data for marketing purposes.

5. Statement regarding whether the data broker implemented a purchaser credentialing process during the prior year:

NA

6. The number of security breaches that the data broker experienced during the prior year: 0 .

Total number of consumers affected by the breaches: 0 .



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7. Where the data broker has actual knowledge that it possesses the brokered personal information of minors, provide a statement detailing the data collection practices, databases, sales activities, and opt-out policies that are applicable to the brokered personal information of minors:

First Direct, Inc. does not knowingly possess nor distribute any data of minors and will remove any data if it is identified as such. First Direct, Inc. requires its customers to warrant compliance with all laws, including those related to marketing to minors.

8. Any additional information or explanation the data broker chooses to provide concerning its data collection practices during the prior year:

First Direct receives information from various trusted companies and sources that collect and supply consumer data. First Direct may also obtain data through public sources. First Direct is not an originator of PII. First Direct employs best practices for data acquisition and security; First Direct is transparent about our privacy policies; First Direct monitors and complies with regulations.

9. Certification of Annual Registration.

I hereby certify, under penalty of law (13 V.S.A. Ch. 65), as an authorized representative of the data broker, that the all of the above information is accurate.

Joel Buhr
PRINTED NAME

Joel Buhr
SIGNATURE

01/29/2019
DATE